

Sullivan & Worcester LLP 1633 Broadway New York, NY 10019 1 212 660 3000 F 212 660 3001 www.sandw.com

MAR 13 2014

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
March 11, 20
DATE FILED R 1 3 2007

VIA FACSIMILE

Honorable George B. Daniels United States District Judge Southern District of New York Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street New York, New York 10007

Re: United States v. Isaac Valdez, No. 05 Cr. 698 (GBD)

Dear Judge Daniels:

This firm represents defendant Isaac Valdez in the above-referenced action. 1 write to respectfully request an adjournment of the conference currently scheduled for March 13, 2014 at 10:00 a.m. until May 22, 2014 at 10:00 a.m.

We request this adjournment because the parties are continuing to negotiate a disposition of all charges pending against Mr. Valdez, including those from the District of Nevada. In particular, we are awaiting receipt of a revised plea agreement, which we will need to review and discuss with Mr. Valdez. In addition, we anticipate the need to follow-up with the U.S. Attorney's Office in Nevada concerning the monetary figures at issue in Count II.

Counsel for the government consents to an adjournment. On behalf of Mr. Valdez, we consent to the exclusion of time through the next conference with the Court.

Respectfully submitted,

Harry H. Rimm

cc: Ryan P. Poscablo, Esq. (Via Email)